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March 8, 2007

**BY E-MAIL & HAND DELIVERY**

The Honorable Vincent J. Poppiti  
BLANK ROME LLP  
Chase Manhattan Center  
1201 Market Street, Suite 800  
Wilmington, DE 19801

**Re:** *LG.Philips LCD Co., Ltd. v. ViewSonic Corp., et al.*, C.A. No. 04-343-JJF

Dear Special Master Poppiti:

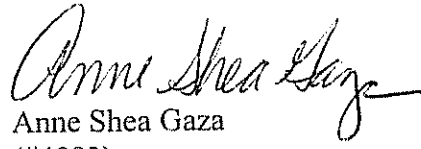
Tatung Company and Tatung Company of America, Inc. (collectively, "the Tatung Defendants") hereby join in Defendant ViewSonic Corporation's ("ViewSonic") motion for a protective order dated March 7, 2007, pursuant to Federal Rule of Civil Procedure 26(c), regarding LG.Philips LCD Co., Ltd.'s ("LPL") overbroad and improper Rule 30(b)(6) deposition topics.

In addition to the arguments raised by ViewSonic regarding identical 30(b)(6) notices, the Tatung Defendants note that they have produced technical documents regarding approximately 800 products even though LPL has thus far accused only 25 products of infringing the patents in suit. Recently, even this number was decreased from 25 to 20. See letter to Special Master Poppiti from Anne Shea Gaza, dated March 7, 2007. Accordingly, LPL's topics directed to *all* "visual display products" are overbroad, not reasonably calculated to lead to the discovery of admissible evidence, and serve no legitimate purpose.

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Based on the foregoing, the Tatung Defendants respectfully request that the Special Master issue an order to protect the Tatung Defendants from the annoyance, harassment, and undue burden caused by LPL's attempt to seek information which is unnecessary, irrelevant, and not likely to lead to discovery of admissible evidence in this action.

Respectfully submitted,

  
Anne Shea Gaza  
(#4093)

Enclosures

cc: Clerk of Court (via CM/ECF)  
Richard Kirk, Esquire (via electronic mail)  
Cormac T. Connor, Esquire (via electronic mail)  
Mark Krietzman, Esquire (via electronic mail)  
Scott R. Miller, Esquire (via electronic mail)  
Jeffrey B. Bove, Esquire (via electronic mail)